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Attorneys for Creditor California Physicians' Service
dba Blue Shield of California

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

In re:

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE REGIONAL
MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 North Cherry Street,
Tulare, CA 93274

Case No. 17-13797

Chapter 9 Case

DC No. WW-84
WW-93

**BLUE SHIELD'S NOTICE OF
OBJECTION AND OBJECTION TO
DEBTOR'S MOTION FOR:**

**(1) ORDER AUTHORIZING
ASSUMPTION AND ASSIGNMENT
OF EXECUTORY CONTRACTS
[Related Docket No. 1160]**

**(2) ORDER AUTHORIZING
REJECTION OF CERTAIN
EXECUTORY CONTRACTS
[Related Docket No. 1272]**

Hearing Information:

Date: April 11, 2019
Time: 9:30 a.m.
Courtroom: 13
Address: 2500 Tulare Street
Fresno, CA 93721

Hon. Rene Lastreto II

TO THE HONORABLE RENE LASTRETO II, UNITED STATES BANKRUPTCY
JUDGE, TULARE LOCAL HEALTHCARE DISTRICT, dba TULARE REGIONAL MEDICAL
CENTER (the "Debtor"), AND PARTIES IN INTEREST:

SNELL & WILMER
L.L.P.
LAW OFFICES
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PLEASE TAKE NOTICE that California Physicians' Service, dba Blue Shield of California ("Blue Shield"), hereby objects to the Debtor's Motion for (1) Order Authorizing Assumption and Assignment of Executory Contracts, filed on February 26, 2019 as Docket Number 1160, and (2) Order Authorizing Rejection of Certain Executory Contracts, filed on March 25, 2019 as Docket Number 1272.

This objection (the "Objection") is made pursuant to 11 U.S.C. Sections 901 and 365, and is made on the grounds that the Debtor has no contracts with Blue Shield. The most recent contracts the Debtor had with Blue Shield were terminated in 2018 when the Debtors shut their doors and surrendered their operating licenses. As a result, there are no contracts between Blue Shield and the Debtor to assume or reject.

This Objection is based on this Notice of Objection and Objection, the concurrently-filed Memorandum of Points and Authorities, and on such other and further matters as the Court will allow.

Dated: April 9, 2019

Respectfully submitted,

SNELL & WILMER LLP

By: /s/ Andrew B. Still

Michael B. Reynolds
Andrew B. Still

Attorneys for California Physicians' Service,
dba Blue Shield of California